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January 22, 2020

VIA ECF

Honorable Joel Schneider
United States Magistrate Judge
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US Courthouse
1 John F. Gerry Plaza, Courtroom 3C
4th and Cooper Streets
Camden, New Jersey 08101

Re: IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION
Civil No. 19-2875 (RBK/JS)

Dear Judge Schneider:

I am writing in follow up to the discussion during the January 15, 2020 telephonic status conference regarding entry of a Direct Filing Order to encompass the addition of Losartan and Irbesartan, and additional defendants, into the MDL. During the call we expressed the need to get this simple administrative step taken care of quickly and the expectation was that defense counsel would get us an agreed order in time to submit for filing on Friday, January 17, 2020. Instead, we were unable to obtain a response from defense counsel until late yesterday, January 21, 2020, and we were advised that there are defendants who have not yet agreed to entry of the direct filing

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order, though we were not told which defendants were balking. We also were told that a redline was being circulated but we could not be told what issues needed to be addressed by the redline.

Plaintiffs reiterate the need for this administrative order to permit plaintiffs to file directly into the MDL, rather having to file in Districts around the country, causing the delay and inefficiency attendant to wait while the cases are transferred to the MDL. We are hopeful that this letter will help move this process to completion, but if not, we request a call tomorrow or Friday for a few minutes so we can hopefully get this issue behind us before next week's case management conference.

Thank you for your consideration.

Respectfully,



ADAM M. SLATER

cc: All Counsel via ECF